

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Consider the )  
Adoption of a General Order and Procedures to )  
Implement the Digital Infrastructure and Video ) Rulemaking 06-10-005  
Competition Act of 2006. )

**REPLY COMMENTS OF VERIZON<sup>1</sup> ON PROPOSED DECISION OF  
COMMISSIONER CHONG RESOLVING ISSUES IN PHASE II**

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September 18, 2007

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<sup>1</sup> These comments are submitted on behalf of Verizon California Inc. in its capacity as holder of California Video Franchise Certificate Number 0001 dated March 8, 2007.

Verizon respectfully submits this reply identifying errors of law and fact in opening comments regarding the Proposed Decision of Commissioner Chong (PD) resolving issues in Phase II of this rulemaking. As with Verizon's opening comments, this reply is limited to the issue of whether additional video and broadband reporting is needed to enforce the Digital Infrastructure and Video Competition Act of 2006 (DIVCA).

**A. VIDEO SUBSCRIBERSHIP BY CENSUS TRACT IS NOT NEEDED FOR DIVCA ENFORCEMENT AND CANNOT LAWFULLY BE REQUIRED**

As Verizon demonstrated in opening comments, video subscribership by census tract is not necessary for DIVCA enforcement, and AT&T and the Small LECs agree.<sup>2</sup> Notably, none of those parties who support this reporting requirement offer any reason why it is needed,<sup>3</sup> or explain why the existing General Order 169 report on video subscribers by franchise is not sufficient for enforcement purposes. As the Commission has recognized, and DIVCA demands,<sup>4</sup> only those obligations that are *truly necessary* for enforcement may be imposed on franchise holders. As Verizon explained in opening comments, this requirement is demonstrably not necessary to enforce any provision of DIVCA. Accordingly, supporting comments should be disregarded and the PD should be changed to eliminate this unlawful report.

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<sup>2</sup> AT&T Opening Comments at 3-5; Small LECs Opening Comments at 10.

<sup>3</sup> California Community Technology Policy Group/Latino Issues Forum Opening Comments (CCPTG/LIF) at 2; Greenlining Institute (Greenlining) Opening Comments at 3; California Cable and Telecommunications Association (CCTA) Opening Comments at 1 (opposing reporting requirement for incumbent cable providers, but asserting that Commission "may have" a legitimate interest in collecting such sensitive information from its members' new competitors).

<sup>4</sup> § 5840(a) ("Neither the commission nor any local franchising entity . . . may . . . impose any requirement on any holder of a state franchise except as expressly provided in this division.").

## **B. OTHER SUGGESTED VIDEO REPORTS ARE LIKEWISE IMPROPER**

A number of parties support the adoption of additional reporting requirements already rejected by the PD. These are unlawful and should not be added to the PD. As AT&T explained again in opening, DIVCA grants this Commission only limited jurisdiction over state franchise holders, and the Commission may not exceed those limitations or impose additional requirements other than those expressly provided for in DIVCA.<sup>5</sup>

CCTPG/LIF, for example, continue to seek information on video service pricing as a factor in assessing the extent to which low income customers subscribe to video services.<sup>6</sup> This argument confuses “access” to video service – already addressed by DIVCA and the Commission’s current rules – with “accessibility” of service, something DIVCA does not address. As the PD correctly notes, DIVCA grants this Commission no jurisdiction over video pricing. Thus, the Commission cannot and should not impose unnecessary and superfluous reports on state franchise holders by seeking pricing information that it cannot require from their competitors. Video services are fully competitive and the Commission has no role in examining or regulating the pricing of those services to insure their “accessibility”.<sup>7</sup> Competition will drive market prices. The same is true with regard to prices of broadband services; those are information

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<sup>5</sup> AT&T Opening Comments at 1-3.

<sup>6</sup> CCTPG/LIF Opening Comments at 2-3; Greenlining Opening Comments at 4.

<sup>7</sup> Indeed, effective competition for video services clearly exists by virtue of the new entrants’ limited market share as well as the presence of at least two video providers in every area where newly-franchised providers serve. See 47 U.S.C. § 543(l)(1). Under federal law, the statutory preference for competition insures reasonable rates for a basic tier of cable service when effective competition exists, and under such circumstances a state commission may not regulate video service rates. See 47 U.S.C. § 543(a)(2) and (b)(1).

services not subject to Commission jurisdiction,<sup>8</sup> and reporting cannot be required.

Likewise, reporting on the quality of service (a term which is not defined)<sup>9</sup> is not within the Commission's jurisdiction and cannot be required. Section 5900(c) provides that local entities, not the Commission, "shall" enforce DIVCA's customer service requirements, and the Commission has already correctly recognized that it has no direct role in this area.<sup>10</sup> No reports in this area can or should be required.

**C. SPECIFIC TECHNOLOGY DETAIL SUCH AS SPEED EXCEEDS DIVCA REQUIREMENTS AND IS NOT NEEDED FOR ENFORCEMENT**

Several parties also reiterate previously rejected arguments for additional reports on specific broadband and video service technology, and their respective speeds, to determine whether holders offer "similar two-way broadband Internet accessibility and similar video programming."<sup>11</sup> But this requirement, too, exceeds the Commission's scope of authority under DIVCA, is unnecessary, and therefore is inappropriate.

DIVCA permits video franchise holders to use "*any technology*" other than "direct-to-home satellite service" to provide video access.<sup>12</sup> It does not require reporting of the specific technology used,<sup>13</sup> or the specific capabilities or functionality of those technologies. It also does not mandate that broadband

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<sup>8</sup> Greenlining Opening Comments at 4.

<sup>9</sup> Greenlining Opening Comments at 4-5 (recommending reports on "slower connections or unreliable service" so Commission can address any problems).

<sup>10</sup> D.07-03-014 at 13, 153, 174, 191, 193 and Conclusion of Law 8.

<sup>11</sup> CCTPG/LIF Opening Comments at 3, citing § 5890(j)(4); The Utility Reform Network Opening Comments at 3.

<sup>12</sup> § 5890(j)(4).

<sup>13</sup> Whether the holder deploys predominantly fiber to the premises architecture, or not, is relevant to which of DIVCA's build-out requirements apply, and therefore the Commission has required this information to be included in applications. See Resolution T-17107, mailed September 10, 2007, at 2.

speeds and functionality be similar throughout all areas of the state. Instead, DIVCA requires reporting on the number of households offered video access; if more than one technology is used, it requires only that such access provide “similar two-way broadband internet accessibility and similar video programming.”


Because only those technologies with “similar” internet accessibility and video programming are to be reported in the first instance, further detail by type of technology (especially at the census group or tract level) is unnecessary to comply with DIVCA. Such information would be of no practical value for the Commission to monitor compliance with DIVCA’s build-out requirements.

### **CONCLUSION**

For the reasons set forth above, no additional reporting requirements should be added to the PD. As urged in opening comments, the PD should be changed to eliminate any requirements to report (1) video subscribership by census tract, and (2) customer usage of wireless broadband services by type of device.

Dated: September 18, 2007

Respectfully submitted,

By:   
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## **CERTIFICATE OF SERVICE**

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, Thousand Oaks, CA 91362; I have this day served a copy of the foregoing:

**REPLY COMMENTS OF VERIZON ON PROPOSED DECISION OF  
COMMISSIONER CHONG RESOLVING ISSUES IN PHASE II**

by electronic mail to those parties on the service list shown below who have supplied an e-mail address, and by U.S. mail to all other parties on the service list.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 18<sup>th</sup> day of September, 2007, at Thousand Oaks, California.

/s/Thomas Bird  
THOMAS BIRD

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## Service Lists

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**Filer: CPUC - CABLE TELEVISION**

**List Name: INITIALLIST**

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